

THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI

BRITTANY POLLARD, INDIVIDUALLY;  
SAMUEL POLLARD, JR., INDIVIDUALLY;  
AND BRITTANY POLLARD AND SAMUEL POLLARD, JR.  
ON BEHALF OF ALL WRONGFUL DEATH BENEFICIARIES  
OF CHLOE LEIGH POLLARD, DECEASED

PLAINTIFFS

VS.

CAUSE NO. 20-351

EDITH SMITH-RAYFORD, M.D.; SAMUEL BROWN, M.D.;  
JACKSON HMA, LLC A/K/A MERIT HEALTH CENTRAL D/B/A  
CENTRAL MISSISSIPPI MEDICAL CENTER  
AND JOHN DOES 1-10

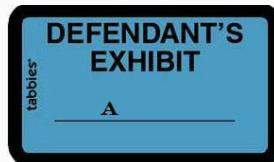
DEFENDANTS

**COMPLAINT**  
**(JURY TRIAL DEMANDED)**

COME NOW Plaintiffs, Brittany Pollard and Samuel Pollard, Jr., Individually and on behalf of all wrongful death beneficiaries of Chloe Leigh Pollard, by and through counsel, and files this, Complaint against the Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center, as follows, to-wit:

**P A R T I E S**

1. Plaintiffs, Brittany Pollard and Samuel Pollard, Jr., are bonafide adult residents of Hinds County, Mississippi. Plaintiffs are the natural parents, heirs-at-law and wrongful death beneficiaries of decedent Chloe Leigh Pollard.
2. Defendant, Edith Smith-Rayford, M.D., is an adult resident citizen of Hinds County, Mississippi, who may be served with the process of this Court at her place of employment 5429 Robinson Road Ext. Jackson, Mississippi 39204. At all times material hereto, Defendant, Edith Smith-Rayford, M.D., was the agent, servant, employee, staff physician and/or resident physician of Jackson HMA, LLC, a/k/a Merit Health Central d/b/a Central Mississippi Medical Center



(hereinafter "Jackson HMA, LLC") and acting within the course and scope of her employment with Jackson HMA, LLC, a/k/a Merit Health Central d/b/a Central Mississippi Medical Center (hereinafter "Jackson HMA, LLC").

3. Defendant, Samuel Brown, M.D., is an adult resident citizen of Hinds County, Mississippi, who may be served with the process of this Court at his place of employment, 1860 Chadwick Drive Ste. 300, Jackson, MS 39204. At all times material hereto, Defendant, Samuel Brown, M.D., was the agent, servant, employee, staff physician and/or resident physician of Jackson HMA, LLC, a/k/a Merit Health Central d/b/a Central Mississippi Medical Center (hereinafter "Jackson HMA, LLC") and acting within the course and scope of his employment with Jackson HMA, LLC, a/k/a Merit Health Central d/b/a Central Mississippi Medical Center (hereinafter "Jackson HMA, LLC").

4. Defendant, Jackson HMA, LLC, a/k/a Merit Health Central d/b/a Central Mississippi Medical Center (hereinafter "Jackson HMA, LLC"), is an entity incorporated under the laws of Mississippi and operating in the State of Mississippi through its physicians, staff, agents, servants, employees and representatives, in Hinds County, Mississippi, and which may be served with the process of this court by serving its registered agent, CSC of Rankin County, Inc., Mirror Lake Plaza, 2829 Lakeland Drive Suite 1502 Flowood, MS 39232.

5. Defendants, John Does 1 through 10, are unknown Defendants who are parties herein pursuant to Rule 9(h) of the Mississippi Rules of Civil Procedure. The exact identity of John Does 1 through 10 is unknown to the Plaintiff at the present time. Said fictitious parties shall be identified as party Defendants upon the discovery of the identities thereof.

6. At all times alleged herein, Jackson HMA, LLC, a/k/a Merit Health Central d/b/a

Central Mississippi Medical Center (hereinafter “Jackson HMA, LLC”), held itself out to the general public and to Plaintiffs, in particular, as a highly qualified hospital staffed by highly trained medical experts, including, but not limited to, physicians, certified nurse practitioners, licensed nurses and other skilled medical personnel, and the Defendant was actively engaged in such medical care and practice in Jackson, Mississippi.

7. At all times alleged herein, Edith Smith-Rayford, M.D., held herself out to the general public and to Plaintiffs, in particular, as a competent, licensed physician, capable of providing a high degree of skill, care and knowledge, and the Defendant was actively engaged in such medical care and practice in Jackson, Mississippi.

8. At all times alleged herein, Samuel Brown, M.D., held himself out to the general public and to Plaintiffs, in particular, as a competent, licensed physician, capable of providing a high degree of skill, care and knowledge, and the Defendant was actively engaged in such medical care and practice in Jackson, Mississippi.

#### **JURISDICTION AND VENUE**

9. Plaintiffs would show that this Court is vested with both subject matter and in personam jurisdiction and venue is proper in this Court.

#### **INTRODUCTION**

10. This civil action is brought pursuant to §11-7-13, Miss. Code Ann., as amended, commonly known as the “Wrongful Death” statute. Chloe Leigh Pollard died in Hinds County, Mississippi, on April 13, 2018, as a result of the negligence of the Defendants named herein. This civil action is brought for the benefit of all of the heirs-at-law of Chloe Leigh Pollard and the Estate of Chloe Leigh Pollard, Deceased.

11. Pursuant to the provisions of §11-7-13, Miss. Code Ann., as amended, Chloe Leigh Pollard suffered compensable damages in the form of physical pain and suffering, mental anguish, medical expenses and funeral expenses for which she would have been entitled to recover had she survived said medical treatment.

12. Pursuant to the provisions of §11-7-13, Miss. Code Ann., as amended, Brittany Pollard and Samuel Pollard, Jr. and the heirs-at-law of Chloe Leigh Pollard, Deceased, seek compensatory and punitive damages against Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center and John Does 1 through 10 based upon the theory of medical negligence.

#### **BACKGROUND**

13. In August, 2017, Dr. Edith Smith-Rayford undertook the medical care and treatment of Brittany Pollard at Central Mississippi Health Services, Inc. for the purpose of pre-natal care and delivery of her infant child. During the course of said care and treatment, Dr. Edith Smith-Rayford saw Mrs. Pollard for pre-natal care and was to ultimately deliver of her unborn child. Given Dr. Smith-Rayford's past medical treatment of Brittany Pollard, including but not limited to pre-natal care and delivery of each of Mrs. Pollard's other children, Dr. Smith-Rayford knew or should have known that Mrs. Pollard experienced early births. Therefore, Defendant Smith-Rayford should have ensured that in her absence that an attending physician was available should Mrs. Pollard experience early delivery. Given the history with this patient, Dr. Smith-Rayford failed to keep the appointment scheduled for 4/12/2018 or in the alternative have another physician see Mrs. Pollard to perform the scheduled ultrasound on 4/12/2018. By not seeing Ms. Pollard on 4/12/2018, Dr. Smith-Rayford an ultrasound was never performed to ensure that the unborn infant was not in any type of fetal distress.

Had the ultrasound been performed, it would have been clear that Mrs. Pollard was indeed in labor and that the unborn infant was in fetal distress thereby requiring emergency measures to be taken to ensure the safety of both the mother and the unborn infant. By failing to do so, Dr. Smith-Rayford negligently failed to properly recognize the patient's need for hospitalization and diagnostic testing to ensure the safety of the unborn infant and the patient. Dr. Smith-Rayford failed to recognize that Mrs. Pollard was suffering obvious signs of early/premature birth thereby resulting in the early/premature birth and ultimately the death of Chloe Leigh Pollard.

14. On April 13, 2018, Brittany Pollard presented to the Emergency Room at Merit Health Central around 9:15 a.m. complaining of severe pain. Ms. Pollard was held in triage and thereafter ultimately informed that she was in labor. By this time the pain had become so severe that Ms. Pollard requested that she be given an epidural. An epidural was never administered. The nursing staff made numerous attempts to notify the on-call physician Dr. Samuel Brown and/or Dr. Smith-Rayford who was supposed to be within 30 minutes from the hospital at any given time. During the following 3 hours, the nursing staff also attempted to locate the unborn infant's heart beat by use of a fetal heart monitor. Ms. Pollard's pain had worsened to the point that she suffered a spike in her blood pressure which further put to the unborn infant in fetal distress. By the time that the on-call physician, Dr. Samuel Brown, arrived at the hospital Ms. Pollard, along with assistance from Samuel Pollard, had delivered their infant.

**COUNT ONE**  
**MEDICAL MALPRACTICE**

15. Plaintiffs adopt and reallege the above and foregoing allegations set forth in paragraphs 1 through 14 of this Complaint and incorporates the same by reference as if fully set forth

herein.

16. In attempting to treat Brittany Pollard, Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center, committed multiple errors amounting to negligence such as would constitute unreasonable and unacceptable medical practice at the time and place of said diagnosis and treatment. Defendants Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center were negligent in the following manner:

a. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., were negligent in failing to exercise the degree of skill and care, or failing to possess the knowledge or skill ordinarily exercised or possessed by physicians and medical personnel engaged in a similar type of practice in this geographical area;

b. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., were negligent in failing to properly monitor the medical condition of Brittany Pollard and her unborn fetus, specifically, the heart rate and other vital statistics of the unborn fetus;

c. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., were negligent in failing to take immediate action to prevent or adequately treat the existing serious and life threatening medical conditions of the unborn fetus;

d. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., were negligent in failing to surgically intervene by carrying out a cesarean section delivery upon the infant's first entering into severe fetal distress;

e. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., negligently and recklessly failed to adequately investigate the cause of the unborn fetus' life threatening condition; and,

f. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., caused unreasonable and substantial delays in providing proper treatment to Brittany Pollard and her unborn fetus.

g. The infant's death was concurrently caused by failing to realize that: Brittany

Pollard was in pre-term labor thereby causing the unborn infant to enter into fetal distress; by failing to properly monitor the medical condition of the unborn fetus; failing to take immediate action to treat the obvious life threatening medical conditions of the unborn fetus; failing to prescribe the proper medications in an attempt to stop the labor contractions; and, by failing to perform an emergency cesarean section delivery upon the onset of the infant's first signs of severe fetal distress.

17. In committing the multiple acts and omissions complained of above, Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; and, Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center, grossly, willfully and recklessly deviated from the applicable standard of medical care and, by reason thereof, Plaintiffs should be awarded punitive damages so as to deter such conduct by others in the future.

18. As a direct and proximate result of the simple and gross negligence of Defendants, Edith Smith-Rayford, M.D.; and, Samuel Brown, M.D. as complained of above, Brittany Pollard, Samuel Pollard, Jr., the heirs-at-law of Chloe Leigh Pollard, Deceased, and the Estate of Chloe Leigh Pollard, Deceased, have suffered damages as enumerated below:

- a. Plaintiffs suffered physical and psychological injuries;
- b. Chloe Leigh Pollard suffered death;
- c. Chloe Leigh Pollard suffered physical and psychological injuries;
- d. Chloe Leigh Pollard and her heirs-at-law have suffered medical and funeral expenses;
- e. Chloe Leigh Pollard and her heirs-at-law have suffered a loss of enjoyment of life;
- f. Plaintiffs and the heirs-at-law of Chloe Leigh Pollard, Deceased, have suffered the loss of the net cash value of Chloe Leigh Pollard's life; and,
- g. Plaintiffs and the heirs-at-law of Chloe Leigh Pollard, Deceased, have suffered the loss of the love, companionship, society and association of Chloe Leigh Pollard, Deceased.

**COUNT TWO****NEGLIGENCE OF AND, JACKSON HMA, LLC A/K/A MERIT HEALTH CENTRAL  
D/B/A CENTRAL MISSISSIPPI MEDICAL CENTER**

19. Plaintiffs adopt and reallege the above and foregoing allegations set forth in paragraphs 1 through 18 of this Complaint and incorporates the same by reference as if fully set forth herein.

20. In attempting to treat Brittany Pollard and in attempting to perform the delivery of her unborn fetus, Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center, committed multiple errors amounting to negligence such as would constitute unreasonable and unacceptable medical practice at the time and place of said diagnosis and treatment. Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center was negligent in the following manner:

a. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center failed to furnish properly trained and qualified physicians, nurses, medical technicians and other skilled medical personnel to attend Brittany Pollard and her unborn fetus;

b. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center negligently and recklessly failed to perform an adequate physical examination and appropriate diagnostic testing of Brittany Pollard;

c. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center negligently and recklessly failed to take immediate action to prevent or adequately treat the existing serious and life threatening medical conditions of the unborn fetus;

d. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center failed to notify the patient's surgeon of the patient's and the unborn fetus' life threatening condition;

e. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center failed to administer the proper medication to attempt to stop the pre-term labor;

f. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center negligently and recklessly failed to adequately investigate the cause of the pre-term labor;

g. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center negligently and recklessly failed to adequately investigate the cause of the unborn fetus' life threatening condition;

h. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center failed to surgically intervene by carrying out a cesarean section delivery upon the fetus' first entering into severe fetal distress;

i. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center failed to notify the patient's surgeon of the patient's and the unborn fetus' life threatening condition; and,

j. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center caused unreasonable and substantial delays in providing proper treatment to Brittany Pollard and the unborn fetus.

k. The infant's death was concurrently caused by the failure to properly diagnose Brittany Pollard's pre-term labor contractions; monitor the medical condition of the unborn fetus, failure to take immediate action to treat the obvious life threatening medical conditions of the unborn fetus, and the failure to perform an emergency cesarean section delivery upon the onset of the infant's first signs of severe fetal distress.

21. In committing the multiple acts and omissions complained of above, Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center grossly, willfully and recklessly deviated from the applicable standard of medical care and, by reason thereof, Plaintiffs should be awarded punitive damages so as to deter such conduct by others in the future.

22. As a direct and proximate result of the simple and gross negligence of Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center as complained of above, Brittany Pollard, the heirs-at-law of Chloe Leigh Pollard, Deceased, and the

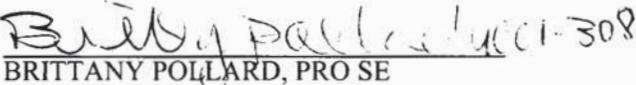
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- a. Plaintiffs suffered physical and psychological injuries;
- b. Chloe Leigh Pollard suffered death;
- c. Chloe Leigh Pollard suffered physical and psychological injuries;
- d. Chloe Leigh Pollard and her heirs-at-law have suffered medical and funeral expenses;
- e. Chloe Leigh Pollard and her heirs-at-law have suffered a loss of enjoyment of life;
- f. Plaintiffs and the heirs-at-law of Chloe Leigh Pollard, Deceased, have suffered the loss of the net cash value of Chloe Leigh Pollard's life; and,
- g. Plaintiffs and the heirs-at-law of Chloe Leigh Pollard, Deceased, have suffered the loss of the love, companionship, society and association of Chloe Leigh Pollard, Deceased.

WHEREFORE, PREMISES CONSIDERED, Brittany Pollard, Samuel Pollard, Jr., the heirs-at-law of Chloe Leigh Pollard, Deceased, and the Estate of Chloe Leigh Pollard, Deceased, sue and demand judgment for actual and punitive damages sufficient to fairly compensate them for the injuries caused by Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; and, Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center and John Does 1through 10, within the subject matter jurisdiction of this Court together with pre-judgment interest, post-judgment interest and all costs herein.

Respectfully submitted,

BRITTANY POLLARD, SURVIVING  
MOTHER OF CHLOE LEIGH POLLARD,  
DECEASED

BY:   
BRITTANY POLLARD, PRO SE

Respectfully submitted,  
SAMUEL POLLARD, SURVIVING  
FATHER OF CHLOE LEIGH POLLARD,  
DECEASED

BY:

  
SAMUEL POLLARD PRO SE 25CI-2560

<b>COVER SHEET</b>		Court Identification Docket #		Case Year	Docket Number										
Civil Case Filing Form (To be completed by Attorney/Party Prior to Filing of Pleading)		<input type="text" value="25"/> <input type="text" value="1"/> <input type="text" value="CIR"/>	<input type="text" value="2020"/> <input type="text" value="351"/>												
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In the <u>CIRCUIT</u>		Court of <u>HINDS</u>		County - <u>FIRST</u> Judicial District											
Origin of Suit (Place an "X" in one box only)															
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Plaintiff - Party Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form															
Individual		Last Name <u>POLLARD</u>	First Name <u>BRITTHANY</u>	Maiden Name, if applicable	M.I. <u>M.D.</u>										
Business		Enter legal name of business, corporation, partnership, agency - if Corporation, indicate the state where incorporated													
Address of Plaintiff		<u>322 North Preston Street Apt 501, MS 39209</u>													
Attorney (Name & Address)		<u>James C. Pollard, PLLC, 322 North Preston, MS 39209</u>		MS Bar No. <u>222223</u>											
Signature of Individual Filing:		<u>X Britthany Pollard JCE1-2013</u>													
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form															
Individual		Last Name <u>Smith - RAYford</u>	First Name <u>Edith</u>	Maiden Name, if applicable	M.I. <u>M.D.</u>										
Business		Enter legal name of business, corporation, partnership, agency - if Corporation, indicate the state where incorporated													
Attorney (Name & Address) - if Known		MS Bar No.													
Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet															
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<input type="checkbox"/> Domestic Relations <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce/Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Term. of Parental Rights-Chancery <input type="checkbox"/> UIPSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____	<input type="checkbox"/> Business/Commercial <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____	<input type="checkbox"/> Children/Minors - Non-Domestic <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion <input type="checkbox"/> Minor Removal of Minority <input type="checkbox"/> Other _____													
<input type="checkbox"/> Appeals <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Municipal Court <input type="checkbox"/> Other _____	<input type="checkbox"/> Probate <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Mental Health Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muntment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Alcohol/Drug Commitment _____	<input type="checkbox"/> Civil Rights <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____													
<input type="checkbox"/> Contract <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Instalment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____	<input type="checkbox"/> Statutes/Rules <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Decaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____	<input type="checkbox"/> Real Property <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____													
<input type="checkbox"/> Torts <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Intentional Tort <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____															



Case: 25CI1:20-cv-00351-AHW Document #: 2-1 Filed: 06/11/2020 Page 3 of 4

IN THE Circuit COURT OF Hinds COUNTY, MISSISSIPPI  
First JUDICIAL DISTRICT, CITY OF \_\_\_\_\_

Docket No. \_\_\_\_\_ Docket No. If Filed \_\_\_\_\_  
 File Yr \_\_\_\_\_ Chronological No. \_\_\_\_\_ Clerk's Local ID \_\_\_\_\_  
 Prior to 1/1/84 \_\_\_\_\_

DEFENDANTS IN REFERENCED CAUSE - Page 1 of \_\_\_\_\_ Defendants Pages  
 IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

## Defendant #2:

Individual: Brown (Last Name) Samuel (First Name) M. D. (Middle Init.) J.Smith, IV (J.Smith, IV)

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

## Defendant #3:

Individual: \_\_\_\_\_ (Last Name) \_\_\_\_\_ (First Name) \_\_\_\_\_ (Middle Name, if Applicable) \_\_\_\_\_ (Middle Init.) \_\_\_\_\_ (J.Smith, IV)

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A JACKSON HMA, LLC / CMMC

Business JACKSON HMA, LLC \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

## Defendant #4:

Individual: John Does (Last Name) J-10 (First Name) \_\_\_\_\_ (Middle Name, if Applicable) \_\_\_\_\_ (Middle Init.) \_\_\_\_\_ (J.Smith, IV)

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Case: 25CI1:20-cv-00351-AHW Document #: 2-1 Filed: 06/11/2020 Page 4 of 4

IN THE Circuit COURT OF Hinds COUNTY, MISSISSIPPI  
First JUDICIAL DISTRICT, CITY OF

Docket No. \_\_\_\_\_ File Yr \_\_\_\_\_ Chronological No. \_\_\_\_\_ Clerk's Load ID \_\_\_\_\_ Docket No. If Filed \_\_\_\_\_  
 Prior to 1/1/94 \_\_\_\_\_

DEFENDANTS IN REFERENCED CAUSE - Page \_\_\_ of \_\_\_ Defendants Pages  
 IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Defendant # \_\_\_ :

Individual: \_\_\_\_\_ (Last Name \_\_\_\_\_ First Name \_\_\_\_\_ Maiden Name, if Applicable \_\_\_\_\_ Middle Init. \_\_\_\_\_ Jr/Sr/II/IV \_\_\_\_\_)

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business John Does 1-10 \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Defendant # \_\_\_ :

Individual: \_\_\_\_\_ (Last Name \_\_\_\_\_ First Name \_\_\_\_\_ Maiden Name, if Applicable \_\_\_\_\_ Middle Init. \_\_\_\_\_ Jr/Sr/II/IV \_\_\_\_\_)

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business John Does 1-10 \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Defendant # \_\_\_ :

Individual: \_\_\_\_\_ (Last Name \_\_\_\_\_ First Name \_\_\_\_\_ Maiden Name, if Applicable \_\_\_\_\_ Middle Init. \_\_\_\_\_ Jr/Sr/II/IV \_\_\_\_\_)

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business John Does 1-10 \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI

BRITTANY POLLARD, INDIVIDUALLY;  
SAMUEL POLLARD, JR., INDIVIDUALLY;  
AND BRITTANY POLLARD AND SAMUEL POLLARD, JR.  
ON BEHALF OF ALL WRONGFUL DEATH BENEFICIARIES  
OF CHLOE LEIGH POLLARD, DECEASED

PLAINTIFFS

VS.

CAUSE NO.

20-351

EDITH SMITH-RAYFORD, M.D.; SAMUEL BROWN, M.D.;  
JACKSON HMA, LLC A/K/A MERIT HEALTH CENTRAL D/B/A  
CENTRAL MISSISSIPPI MEDICAL CENTER  
AND JOHN DOES 1-10

DEFENDANTS

S U M M O N S

TO ANY LAWFUL OFFICER AUTHORIZED TO SERVE PROCESS:  
YOU ARE HEREBY COMMANDED TO SUMMON:

Samuel Brown, M.D.  
1860 Chadwick Drive Ste. 300  
Jackson, MS 39204

NOTICE TO DEFENDANT

THE PETITION WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST  
TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS BY FILING YOUR ANSWER AS  
PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE.

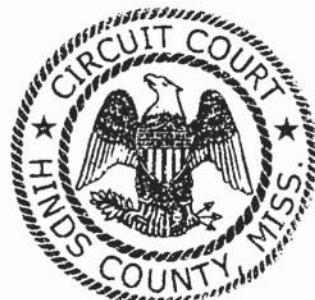
You are required to mail or hand-deliver a copy of a written response to the Complaint to Plaintiffs Brittany Pollard and Samuel Pollard, Jr., whose post office address is 322 North Prentiss Street, Jackson, MS 39209. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a judgment by default will be entered against you for the money or other things demanded in the Petition.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 11 day of June, 2020.

Zack Wallace, Chancery Clerk  
Hinds County, Mississippi

BY: M. Green D.C.



THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI

BRITTANY POLLARD, INDIVIDUALLY;  
SAMUEL POLLARD, JR., INDIVIDUALLY;  
AND BRITTANY POLLARD AND SAMUEL POLLARD, JR.  
ON BEHALF OF ALL WRONGFUL DEATH BENEFICIARIES  
OF CHLOE LEIGH POLLARD, DECEASED

PLAINTIFFS

VS.

CAUSE NO. 20-351

EDITH SMITH-RAYFORD, M.D.; SAMUEL BROWN, M.D.;  
JACKSON HMA, LLC A/K/A MERIT HEALTH CENTRAL D/B/A  
CENTRAL MISSISSIPPI MEDICAL CENTER  
AND JOHN DOES 1-10

DEFENDANTS

SUMMONS

TO ANY LAWFUL OFFICER AUTHORIZED TO SERVE PROCESS:  
YOU ARE HEREBY COMMANDED TO SUMMON:

Edith Smith-Rayford, M.D.  
5429 Robinson Road Ext.  
Jackson, Mississippi 39204

NOTICE TO DEFENDANT

THE PETITION WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST  
TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS BY FILING YOUR ANSWER AS  
PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Plaintiffs Brittany Pollard and Samuel Pollard, Jr., whose post office address is 322 North Prentiss Street, Jackson, MS 39209. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a judgment by default will be entered against you for the money or other things demanded in the Petition.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 11 day of June, 2020.



Jack Wallace, Chancery Clerk  
Hinds County, Mississippi

J. Wallace